



September 15, 2016

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform - Mobility Fund*

Dear Ms. Dortch:

On September 14, 2016, Rebecca Murphy Thompson and I of Competitive Carriers Association (“CCA”) met with Claude Aiken, Legal Advisor to Federal Communications Commission (“FCC” or “Commission”) Commissioner Mignon Clyburn, Wireline, to discuss the above-referenced proceeding. During the meeting, CCA discussed Commission efforts to reform the high-cost Universal Service Fund (“USF”) program and offered recommendations for the Mobility Fund II program to help preserve and expand consumer-demanded wireless services in rural America.

Specifically, CCA encouraged the Commission to provide sufficient and predictable funding that can sustain mobile wireless operations and avoids flash cuts for legacy funding. Mobility is essential for next generation technology including 5G and the Internet of Things to flourish throughout the country.¹ The Commission must not strand currently served consumers without mobile networks - consumers’ preferred choice - particularly in rural and disadvantaged areas.² As a result, funding should be made available to meet the Commission’s goal of expanding mobile broadband networks to portions of the country that are currently unserved, while ensuring that rural areas served with the help of USF support are not stranded without wireless coverage.³

¹ For example, new telehealth technologies are connecting consumers in rural and hard to reach areas with urban physicians, and precision agriculture is transforming the ability of American farmers with limited resources to deliver productivity gains and environmental sustainability.

² See *Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 (filed Nov. 16, 2015); see also *Ensuring Intermodal USF Support for Rural America Before the S. Comm. on Commerce, Sci., and Transp. Subcomm. on Commc’ns, Tech., Innovation, and the Internet*, 114th Cong. (2016) (statement of Steven K. Berry, CEO & President of Competitive Carriers Association).

³ See *id.* If necessary to avoid flash cuts, CCA recommends the FCC implement an extended phase down period for USF legacy support.

Likewise, the Commission should promote innovation and competition in unserved and underserved areas.⁴ For example, the FCC can help to ensure consistent coverage by funding at least a CDMA and a GSM provider in an area to ensure coverage when a wireless consumer falls-back from its carrier's LTE network. Similarly, the Commission should futureproof the high-cost program by funding the latest technologies. CCA reiterated that any USF reform that fails to account for a fallback from a carrier's network or funds antiquated networks threatens to disconnect rural consumers from public safety access, roaming capabilities, and 9-1-1 service.

The FCC also must account for unique operating and capital expenses to deploy in rural and remote areas of the United States.⁵ CCA therefore encouraged the FCC to perform more accurate measurement analysis to identify gaps in coverage.⁶ The Commission should consider the use of drive test results, and account for other metrics like road miles, farm land, and Federal lands. Mobility is essential to participation in today's modern world; it is imperative that the Commission portray an accurate picture of the rural landscape when creating and implementing high-cost USF reform.⁷

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Courtney Neville

Courtney Neville
Policy Counsel
Competitive Carriers Association

cc (via email): Claude Aiken

⁴ See Letter from Sens. Wicker (R-MS), Manchin (D-WV), Baldwin (D-WY), Blunt (R-MO), Burr (R-NC), Capito (R-WV), Daines (R-MT), Ernst (R-IA), Fischer (R-NE), Gardner (R-CO), Heitkamp (D-ND), Johnson (R-WI), King (I-ME), Klobuchar, (D-MN), McCaskill (D-MO), Moran (R-KS), Peters (D-MI), Roberts (R-KS), Rubio (R-FL), Tillis (R-FL), Vitter (R-LA), Warner (D-VA), Wyden (D-OR), Cochran (R-MS), Boozman (R-AR), Kirk (R-IL), U.S. Senate, to The Hon. Tom Wheeler, Chairman, Federal Communications Commission (July 11, 2016), *available at* <http://www.wicker.senate.gov/public/index.cfm/2016/7/senators-to-fcc-close-the-rural-broadband-gap> ("Senate Mobility Fund II Letter").

⁵ See *Connect America Fund – Alaska Plan*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 16-271, 10-90 ¶¶ 72-73 (rel. Aug. 31, 2016) ("Alaska Plan").

⁶ See Senate Mobility Fund II Letter.

⁷ See *id.*